

DIVISION OF COMMUNITY & FAMILY HEALTH SERVICES

State of Utah

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DIVISION DIRECTOR'S OFFICE 288 North 1460 West

Mailing Address: PO Box 142001 Salt Lake City, Utah 84114-2001 (801) 538-6161, FAX (801) 538-6510

December 5, 2003

Patricia Daniels
Director, Supplemental Food Programs
Food and Nutrition Service/USDA
3101 Park Center Drive, Room 520
Alexandria, VA 22302

Dear Ms. Daniels,

Thank you for the opportunity to comment on Public Notice 7 CFR Part 246, Revisions to the WIC Food Packages. The Utah WIC Program supports the recommendations that have been made by the National WIC Association (NWA). These recommendations include the following:

- WIC food packages are made consistent and compatible with dietary recommendations in the U.S. Dietary Guidelines for Americans with food quantities and portion sizes that address the nutritional needs of the participants.
- The current standard food packages are modified to provide a minimum of 65% of the RDA for the WIC target nutrients, including folic acid.
- The nutrient content of food prescriptions be the basis for allowable tailoring, and not be limited to food-for-food substitutions.
- States be given the flexibility to select from a wide variety of alternative foods, based on regional availability, participant preferences, cultural acceptability, cost and administrative feasibility, to replace foods in the standard food packages.
- The cost neutrality of food package changes is based on the overall cost of all food packages, rather than on package-for-package comparisons.

The Utah WIC Program also recognizes that with expanded choices in foods, the average food package cost will increase as well. With this in mind, we urge you to review the food funding formula to allow states to afford adding these changes to their authorized foods.

Sincerely,

Kevin Condra, MPA, CHES Utah WIC Program Manager Phyllis S. Crowley, MS, RD, IBCLC Utah WIC Nutrition Coordinator

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